

Commonwealth of Kentucky

Division for Air Quality

PERMIT STATEMENT OF BASIS

Federally Enforceable Conditional Major Draft # F-01-030

United States Smokeless Tobacco Manufacturing, LLC

Hopkinsville, Kentucky.

January 8, 2002

Ben Markin, Reviewer

Plant I.D. # 21-047-00055

Application Log # 53934

SOURCE DESCRIPTION:

United States Smokeless Tobacco Manufacturing, LLC proposes to merge the adjacent sources, tobacco leaf and drying processes (21-047-00055 and 00056) under one single operation. The plants, currently has three state-origin permits, O-80-318, O-86-137 (Revised) and S-97-025 (Revision II), with initial one issued since 1980. Though the source is recognized as a Major Source, the plant was covered by 401 KAR 50:031, limiting its Potential-to-Emit to fifty (50) percent of Major Source threshold of each regulated air pollutant. The authority to operate from the above mentioned permits will be subsumed into this proposed permit.

EMISSION UNITS:

E. Unit 01

Prizing Line

Installed 1978

Processing rate: 18,000 lb/hr

Description

Bundle Buster

Lamina Feeder

First Ordering Cylinder

Second Bundle Buster

Sand Reel

Second Ordering Cylinder

Tipping Ordering Cylinder

E. Unit 02

Threshers/Separators/Screens

Installed 1978

Processing Rate: 18,000 lb/hr

Description

Leaf Threshers/RPL Separators #1 - #6

PL Separators #1 - #5

E. Unit 03

Re-drying Process

Installed 1978

Processing Rate: 12,000 lb/hr

Description

Re-dryer

Kabat Application

E. Unit 04

Stem Dryer

Description

Installed 1978

Processing Rate: 4500 lb/hr

E. Unit 05 (01)

Dry Flour Casing

Installed 1980

Upgraded 1998

Processing Rate: 23,000 lb/hr

Description

Lamina Feeder

Lamina Picker

Casing Cylinder

Bulking Bins

E. Unit 06 (01)

Dry Flour Process

Installed 1980

Upgraded 1995

Processing Rate: 16,000 lb/hr

Description

Conveyors

Cutters

Dryers (#1 & 2)

Silos

E. Unit 07
Indirect Heat Exchanger

Description:
Primary Fuel: Natural Gas
Secondary Fuel: Propane
Rated Capacity: 17mmBTU/hr
Installed: 1978

E. Unit 08
Indirect Heat Exchanger

Description:
Primary Fuel: Natural Gas
Secondary Fuel: Propane
Rated Capacity: 17mmBTU/hr
Installed: 1978

E. Unit 09
Indirect Heat Exchanger

Description:
Primary Fuel: Natural Gas
Secondary Fuel: Propane
Rated Capacity: 25mmBTU/hr
Installed: 1980

E. Unit 10
Emergency Generators

Description:
Primary Fuel: Diesel
Rated Capacity: (2) 750 kW
& (1) 350 kW
Installed: December 2000

E. Unit 11
Pesticide Process
Installed 1994
Processing Rate: 7.5 gal/hr-three buildings
1440 gal/yr
Description
Pesticide Fogging
Pesticide Fumigation

REGULATION APPLICABILITY:

All applicable regulations to the emission units are listed in the permit.

COMMENTS:

Source wide emissions for Particulate Matter, (PM) and Volatile Organic Compounds (VOC) shall not exceed the respective limitations specified in the permit.

Compliance with annual emissions and processing limitations imposed pursuant to Section 1c of the material incorporated by reference in 401 KAR 52:030, Section 5(8)b, and contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.

In accordance with Regulation 401 KAR 52:030, Section 10, incorporating the standard requirements reference material Section 1b, source wide emissions for Particulate Matter (PM) and Volatile Organic Compounds (VOC)] shall not equal or exceed 90 tons per year on a consecutive twelve (12) month total.

Generator operations shall not equal or exceed the agreed limitation of 500 hr/yr.

The permittee shall adhere to the potential emissions limitations specified in the permit.

EMISSIONS AND OPERATING CAP DESCRIPTION:

The source has the potential to be a major source for PM, NO_x and VOC emissions. However, the source has requested to be classified as a conditional major source with a federally enforceable limit not to equal or exceed 100 tons per year. The source is limiting generator operations to 500 hours per year. In addition, the source is limiting the leaf operations to 5376 hours per year. The drying operations, including the indirect heat exchangers will run for 8760 hours per year, thereby limiting the potential emissions source-wide for PM and VOC below 90 tons per year, to preclude the applicability of Regulation 401 KAR 51:017. Also, the permittee is limiting emissions from individual hazardous air pollutants (HAPs) to less than nine (9) tons per year. The operation and the application of phosphine solvent shall not exceed 1440 gallons per year (pesticide fogging and fumigation shall not exceed 576 and 288 hour/year respectively).

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or record-keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.